

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

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In re : Chapter 11  
: Case No. 09-50026 (REG)  
: (Jointly Administered)  
GENERAL MOTORS CORP., et al., :  
: Debtors. :  
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APPLICATION

FOR EX PARTE RELIEF ENTRY-NUNC PRO TUNC - TO  
DEBTORS UNNOTICED AMENDED SALES ORDER APPROVAL  
(I) AUTHORIZING SALE OF ASSETS PURSUANT TO  
AMENDED AND RESTATED MASTER SALE AND PURCHASE  
AGREEMENT WITH NGMCO, INC., A U.S. TREASURY-  
SPONSORED PURCHASER; (II) AUTHORIZING ASSUMPTION  
AND ASSIGNMENT OF CERTAIN EXECUTORY CONTRACTS  
AND UNEXPIRED LEASES IN CONNECTION WITH SALE;  
AND (III) GRANTING RELATED RELIEF THAT INCLUDES  
THE AMENDED MOTION APPLICATION OF APPLICANT/  
PETITIONER LAFONZA EARL WASHINGTON PURSUANT TO THE  
FEDERAL RULES OF BANKRUPTCY PROCEDURE RULES 4001  
(d)(3) and (4) INCLUDING THE FEDERAL RULES OF CIVIL  
PROCEDURE RULES 70, 77, 79, AND TITLE 11 U.S.C.  
SS 363 AND 541

The Motion of Debtors the General Motors Corporation et al.,  
in the above-entitled matter for an Order 'Approving the Sell of  
~~Substantially~~ ALL of Debtors Assets Pursuant To Master Sale and  
Purchase Agreement With Vehicle Acquisition Holdings LLC a U.S.  
Treasury Sponsored Purchaser' before this Court on June 30, 2009,  
but on June 26, 2009, a certain Amended and Restated Master Sale  
and Purchase Agreement that was UNNOTICED to this Applicant/  
Petitioner was given the Order. Harvey R. Miller, Stephen  
Karotkin, Joseph H. Smolinsky and WEIL, GOTSHAL & MANGES LLP  
appeared for Debtors et al., GM and 28 U.S.C. § 1654 authorized  
the personal filings of this Applicant/Petitioner.

Assertedly this Title 11 reorganization process is NOT a Title 28 judicial or judiciary action that authorize this Bankruptcy unit's findings and with specificity such findings were divested due to the 'JURY TRIAL RIGHT DEMAND PRESERVED' for the authorized jury to make findings and cause is shown for this immediate payment and final settlement based on proof of immediate and irreparable injury, loss, and damages repeatedly being caused to be suffered, as follows:

1. 'The Order (I) Authorizing sale of assets pursuant to amended and related master sale and purchase agreement with NGMCO, Inc., a U.S. Treasury sponsored purchaser... (III) GRANTING RELATED RELIEF', was Ordered and approved by this Court.

2. This above-named Applicant/Petitioner's 'AMENDED MOTION APPLICATION' docket #2477 qualifies and satisfies the related relief granted as demanded based on the filed Applications, Affidavits, and Exhibits 'CONDITIONING' the use, sale, or lease of the Debtors property pursuant to 11 U.S.C. § 363 due to applicable nonbankruptcy law NOT permitting this sale etc., of Debtor GM's property free and clear of such interests by the Debtor or any trustee.

3. This Court was/is required to - 'as is necessary' - provide adequate protection of this Applicant's interest according to 11 U.S.C. § 363(e).

4. Title 11 U.S.C. § 363(e), assertedly incorporates the Federal Rules of Bankruptcy Procedure, Rule 4001(a)(2) 'EX PARTE RELIEF' demands which may be granted without prior notice based on the Affidavits and verified Motion/Notices filed on June 19,

2009, clearly shows that immediate, irreparable injury, loss and damages will continue to repeatedly or continuously result; due to no contest or objection nor denial being made, to this entity's 'AMENDED MOTION APPLICATION' Notice the Debtor and its attorneys are prohibited by law from being adverse parties and to ANY/ALL adversary proceedings.

5. According to bankruptcy rules Oral Notice is being given to the trustee or the debtor in possession and to the debtor and copies of the amended Order are being transmitted to these named entities or reference of the Order dated June 26, 2009, Authorizing Sale of Assets Pursuant To Amended and Restated Master Sale and Purchase Agreement With NGMCO, INC., granting this entity's related relief based on, 'Entry of an Order authorizing and approving... ALL related documents, and agreements, as well as ALL exhibits...' provided in the amended Order that necessarily includes this entity's documents and exhibits filed at docket #2477.

Good cause appearing,

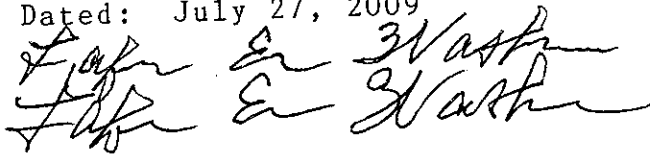
IT IS HEREBY ORDERED THAT monetary relief in the sum of \$1,588,577,640.00 at 15% annual interest or at \$556,940.00 per day calculated thru Monday, July 27, 2009, be paid to the order of Applicant/Petitioner Lafonza Earl Washington, without delay by certified U.S. Treasury check cashable at any Treasury controlled financial institution by Debtors and Debtors in Possession attorneys WEIL, GOTSHAL & MANGES LLP, including Harvey R. Miller, Stephen Karotkin and Joseph H. Smolinsky.

IT IS FURTHER ORDERED THAT if any delay more than 24 hours

or next day delivery is caused by WEIL, GOTSHAL & MANGES LLP and its Attorneys Harvey R. Miller, Stephen Karotkin and Joseph H. Smolinsky that this Application is directed to this Court's clerk for assistance and/or writ of execution to complete the delivery of possession at the cost of the disobedient entity.

IT IS FURTHER ORDERED THAT next day delivery of this payment is directed to be "signed" for ONLY by Lafonza Earl Washington between 8:00 AM and 2:00 PM at the address on the Certificate of Service.

Dated: July 27, 2009

The image shows two handwritten signatures of Lafonza Earl Washington, one above the other, in cursive script.

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Lafonza Earl Washington  
Applicant/Petitioner

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WEIL, GOTSHAL & MANGES LLP  
Debtor and Debtors in Possession Attorneys

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